

service and that failure to respond to produce the items requested will be grounds for a motion by Respondent in an appropriate court of law, pursuant to the provisions of **Rule 37 SCRCP** to compel production and impose sanctions.

PLEASE TAKE FURTHER NOTICE of the “Definitions” and “Instructions” cited in **Exhibit A** hereto, by reference made a part hereof.

DOCUMENTS TO BE PRODUCED

In accordance with the cited legal authorities and the Definitions and Instructions contained in **Exhibit A** hereto, the above named parties are respectfully requested to produce the following documents as may be appropriate:

1. A copy of any ORS “**Policy Manual**” or equivalent as provided for by statutes in the State of South Carolina Code of Laws as Amended.

2. A copy of any and all **internal administrative documents** including policy statements, operational directives, staff training or instructional manuals, or as may be required by the State Administrative Procedures or any other relevant Act:

1. Stating or describing the ORS policies, instructions or directives to its staff for **the conduct of in-house investigations** of consumer complaints and electric utility petitions against consumers such as the subject Petition to Terminate.

2. Stating or describing to what extent, if any, the ORS, per se, and its respective Executives, are required to order and use such in-house staff investigations for any given case.

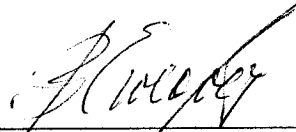
3. A copy of any and all originals and all copies of any and all communications or correspondence of any kind whatsoever (e.g., email, telefax, written memoranda, notes, photographs or letters and the like), by and between the ORS, any individual member of

the ORS, its Officers and/or Staff Members, and employees, representatives or agents of Petitioner, directly or indirectly related to the subject Petition.

4. Copies and records of any and all **ex parte communications** by and between any of the stated parties and the employees, representatives and agents of Petitioner, pursuant to Exhibit A. hereto.

5. Copies of any and all ORS formal or informal rulings that may have been issued pertaining to conduct of ex parte communications.

DATED: Little Rock, Dillon County, South Carolina, February 9, 2006.

A handwritten signature in black ink, appearing to read 'B. Weaver', is written over a horizontal line.

Beatrice Weaver, Respondent Pro Se
1253 Harlles Bridge Road,
Dillon S.C. 29536
Ph/Fax: 843 841 1606

DEFINITIONS

1. "You" or "your" includes yourself, your agents, employees, attorneys, and anyone else acting on your or their behalf.
2. "Writing" means any tangible thing upon which is recorded any form of communication or representation, including letters, words, pictures, sounds, or symbols, or any combination thereof, by means of handwriting, typewriting, printing, photographing, xeroxing, sound recording, carbon copy or any other method of recording. This definition includes, but is not limited to, records, reports, papers, documents, photographs, books, letters, notes, memoranda, statements, tape recordings, phonograph recordings, and microfilm, whether in your possession, custody or under your control, relating to or pertaining in any way to the subject in connection with which it is used; and includes, without limitation, all file copies and all drafts prepared in connection with such writings, whether used or not.
3. As used herein, the term "documents" means and includes all of the following:
 - a) Any and all tangible things or items, whether handwritten, typed, printed, tape recorded, electronic recordings, video-taped recordings visually reproduced, stenographically reproduced or reproduced in any other manner;
 - b) Any and all writings of any kind or type whatsoever;
 - c) Any and all original and all copies of any and all communications;
 - d) Any and all books and pamphlets;
 - e) Any and all microtape, microfilm, photographs, movies, records, recordings, tape recordings, and videotape recordings, stenographically or otherwise reproduced;
 - f) Any and all diaries and appointment books;
 - g) Any and all cables, wires, memoranda, reports, notes, minutes and inter-office communications;
 - h) Any and all letters and correspondence;
 - i) Any and all drawings, blueprints, sketches and charts;
 - j) Any and all contracts or agreements;

EXHIBIT "A."

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- k) Any and all other legal instruments or official documents;
- l) Any and all deeds, leases, mortgages, assignments or other instruments relating to real property or personal property;
- m) Any and all published materials of any kind;
- n) Any and all financial statements, balance sheets, profit and loss statements, statements of financial condition, income tax returns including all schedules and attachments, worksheets, reports, projections, schedules, ledgers, books, records, and journals;
- o) Any and all vouchers, expense accounts, receipts, invoices, bills, orders, billings and checks;
- p) Any and all files and records;
- q) Any and all notes or summaries of conferences, meetings, discussions, interviews, or telephone conversations or messages;
- r) Any and all travel reports and vouchers;
- s) Any and all drafts or draft copies of any of the above.

INSTRUCTIONS

The following instructions are to be considered applicable to all demands for production of documents and things contained herein:

1. In producing these documents, you are requested to furnish all documents known or available to you regardless of whether these documents are possessed directly by you or your agents, employees, representatives, investigators or by your attorneys or their agents, employees, representatives or investigators.
2. If any of these documents cannot be produced in full, produce to the extent possible, specifying your reasons for your inability to answer the remainder and stating whatever information, knowledge or belief you do have concerning the unproduced portion.
3. If any documents or things requested were at one time in existence, but are no longer in existence, please so state, specifying for each document or thing, (a) the type of

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documents or thing, (b) the types of information contained thereon, (c) the date upon which it ceased to exist, (d) the identity of all persons having knowledge of the circumstances under which it ceased to exist, and (e) the identity of all persons having knowledge or who had knowledge of the contents.

4. This request is a continuing one. If, after producing documents the above-named Plaintiff obtains or becomes aware of any further documents responsive to this Request, said Plaintiff is required to produce to Defendants above-named such additional documents.

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

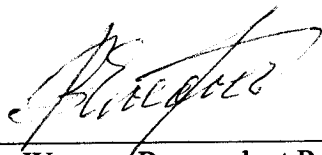
February 11, 2006

In the Matter of)	CERTIFICATE OF SERVICE
)	
Petition of Progress Energy Carolinas, Inc))	
To Terminate Service)	
_____)	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that Respondent Pro Se Beatrice Weaver's Request for Production of Documents By the S.C. Office of Regulatory Staff, will be or has been served upon the above-mentioned Petitioner, the Office of Regulatory Staff and the S.C. Public Service Commission, at their respective addresses by means of U.S. Postal Service mail, and telefax communication, on or before February 16, 2006.

DATED: Little Rock, Dillon County, South Carolina, February 11, 2005



Beatrice Weaver, Respondent Pro Se
1253 Harllees Bridge Road,
Dillon S.C. 29536
Ph/Fax: 843 841 1606